

DECLARATION OF CLARA MOUSSA BOUSTANY

CLARA MOUSSA BOUSTANY declares and says, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a party to divorce proceedings initiated in Monaco by my husband, Fadi Boustany. I make this declaration in support of my application for discovery in aid of that proceeding pursuant to 28 United States Code, Section 1782. The following is based upon my personal knowledge or, where indicated, upon information and belief.

2. I was married to Fadi for 16 years. We share three children: twins, both nine years old, and a daughter who is 15 years old.

3. Fadi suffers from multiple sclerosis, an incurable disease that has left him 98% physically disabled to date.

4. I believe that Fadi is being influenced or manipulated to conceal his income and assets from the Monegasque court to minimize the amount he must pay to me and our children during the divorce proceedings and after the divorce.

5. I estimate that Fadi's fixed expenses exceed €100,000 per month.

6. Stephen Valkenborg, former general manager of the Metropole shopping center, has informed me that Fadi controls — through his company — the Metropole group, which comprises a 5-star “palace” hotel (70% of which is indirectly owned by Fadi) in the Golden Triangle in Monaco, an adjacent luxury residence building, a parking facility with more than 130 spaces (each one costs €500,000), and a shopping center (40% of which is indirectly owned by Fadi) with approximately 80 shops and six restaurants.

7. In 2015, Fadi refused an offer to sell the Metropole group for two billion euros.

8. Fadi is the economic beneficiary of the Lebanese company Solidere, which I understand has assets of approximately \$2 billion.

9. Fadi lives in a flat whose monthly rent is estimated at approximately €100,000. He travels on private jets and employs three drivers and four caretakers, among other staff.

10. Stephen Valkenborg was general manager of the Metropole shopping center from 2017 to December 2022.

11. Stephen Valkenborg resides at 49 East 63rd Street, New York, NY 10065.

12. Makram Abboud is a Board Member of Solidere and maintains a residence in New York City at 41 East 60th Street #6, New York, NY 10022, where he stays regularly.

13. Antonio and Karine Ellek are close family friends. On September 10, 2022, I met with Antonio and Karine for a coffee at the METCAFE, located in the Metropole shopping center. Attached hereto as Exhibit 1 is a screenshot of a text from Antonio with pictures of myself with Karine on that day.

14. During our meeting Antonio disclosed that he is one of the trustees of a trust into which Fadi has been transferring substantial assets. Fadi never informed me of those transfers. I believe those transfers were made to conceal the true extent of his assets and to deprive me of my marital and inheritance rights.

15. Antonio Ellek resides at 841 Andalusia Avenue, Coral Gables, Florida 33134.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: Principalty of Monaco
 January 19, 2023



CLARA MOUSSA BOUSTANY